

October 7, 2022

The Honorable Theodore D. Chuang  
United States District Court Judge  
United States District Court for the District of Maryland  
6500 Cherrywood Lane  
Greenbelt, MD 20070

RE: *Joe Johnson v. Think Computer Corporation*, Case No. 8:22-cv-02422-TDC

Dear Judge Chuang:

Pursuant to the Case Management Order entered in the above captioned matter, the undersigned requests a *pre*-motion conference to discuss the filing of a Rule 11 Motion for Sanctions and other relief under 28 U.S.C. §1447(c).

Specifically, on September 28, 2022, the undersigned moved to strike the Notice of Removal and to Remand this action to the Circuit Court for Prince George's County on the basis that removal in this case was filed by an individual who was not a named Defendant in the State court action, Aaron Greenspan, and he thus had no standing to remove it from the State Court, and the initial pleading that he filed is a nullity and therefore could not confer removal jurisdiction. (Doc. 10, 10-1). The undersigned served Greenspan with a Rule 11 Motion as required by the "safe harbor" provision of the Federal Rules of Civil Procedure in which he was put on notice that the undersigned intended to seek sanctions and a *pre*-filing injunction on the ground that he improvidently removed this action from the Circuit Court without any objective basis for doing so in that he knew that he was not a named defendant in the state action and that as a non-party, he had no legal basis to remove it, but instead, misrepresented in his removal papers that he was a defendant. Greenspan; however, has not taken any action to dismiss this improperly filed removal action.

Therefore, in accordance with the Court's Case Management Order, the undersigned respectfully requests a *pre*-motion conference to consider this issue.

Sincerely,

  
Joe Johnson

Cc: Oliver Edwards, Esq.